



Federal Communications Commission
Washington, D.C. 20554

July 23, 2021

DA 21-889

William Wade, Chief Executive Officer
Mark Soria, Chairman
April Pone, President
International Access, Inc. d/b/a Access International
725 Lakefield Road, Suite G
Westlake, CA 91361
bill@access-intl.com

Via Email and Certified Mail, Return Receipt Requested

**Re: Potential Reclamation of International Access, Inc. (d/b/a Access International)'s
International Signaling Point Code, 3-182-1 (Los Angeles, CA)**

Dear Messrs. Wade and Soria, and Ms. Pone:

By this letter, we inform you of our intent to reclaim the above-captioned International Signaling Point Code (ISPC), provisionally assigned to International Access, Inc. (International Access) unless you respond to this letter within thirty (30) days, by **August 23, 2021**, and indicate whether International Access is still using the code.

The Federal Communications Commission (Commission), as the Administrator for the United States, assigns ISPCs for Signaling System No. 7 networks under ITU-T Recommendation Q.708.¹ In 1999, the Commission granted International Access's application for an ISPC in Los Angeles, CA and provisionally assigned it ISPC 3-182-1.² The Commission has explained that ISPCs are a scarce resource and "[a]s a result, code assignments are conditional upon their being used within one year lead time, so that the Commission can reassign unused codes to another carrier."³ ITU-T Recommendation Q.708 provides that the Commission should withdraw an ISPC assignment if the code is "no longer in use or required" by the operator, among other reasons.⁴ Additionally, International Access was subject to the

¹ International Telecommunication Union (ITU), ITU-T Recommendation Q.708 (03/99), Series Q: Switching and Signalling, Specifications of Signalling System No. 7 – Message Transfer Part (MTP), Assignment procedures for international signalling point codes, <https://www.itu.int/rec/recommendation.asp?lang=en&parent=T-REC-Q.708-199903-I> (ITU-T Recommendation Q.708).

² International Access, Inc., File No. SPC-NEW-19991108-00105 (filed Nov. 8, 1999).

³ *Reporting Requirements for U.S. Providers of International Telecommunications Services; Amendment of Part 43 of the Commission's Rules*, Notice of Proposed Rulemaking, 19 FCC Rcd 6460, 6474, para. 36, n.83 (2004); see also *China Telecom (Americas) Corporation*, GN Docket No. 20-109 *et al.*, Order Instituting Proceedings on Revocation and Termination and Memorandum Opinion and Order, 35 FCC Rcd 15006, 15040, para. 58 (2020) ("ISPCs are a scarce resource that are used by international Signaling System 7 (SS7) gateways as addresses for routing domestic voice traffic to an international provider and anyone seeking an ISPC assignment is required by rule to file an application with the Commission and comply with its procedures.").

⁴ ITU-T Recommendation Q.708 at 6.

annual traffic and revenue reporting requirements at the time of its ISPC assignment.⁵ We have no record that International Access filed any International Traffic and Revenue Reports for the years 2005-2014.⁶

Between March 2020 and January 2021, International Bureau staff made several attempts to contact International Access to ascertain whether it is using its assigned ISPC. On March 9, 2020, the staff called International Access's phone number on record, which apparently is no longer in service.⁷ The staff also contacted the counsel who prepared International Access's international section 214 application in 1999 (File No. ITC-214-19990913-00595). Counsel informed staff that he had not represented International Access for years but did provide a last known email address. Staff then sent two emails to this address and though the emails were apparently read, both went unanswered.⁸ Based on our inability to contact a representative for International Access, the lack of responses to our emails, and International Access's apparent failure to file any International Traffic and Revenue Reports for 2005-2014, we believe that International Access may no longer be in operation and therefore no longer using its assigned ISPC.

We request that you respond to this letter by **August 23, 2021**, and indicate the date the code was implemented and describe the current use of International Access's ISPC (3-182-1). A failure to respond to this letter serves as confirmation that International Access is no longer using its provisionally assigned ISPC and has failed to comply with our ISPC requirements. Consistent with the terms of ITU-T Recommendation Q.708, we will reclaim the ISPC (3-182-1) and immediately make the code available for reassignment if you fail to respond to this letter as requested. We are addressing this letter to the most recent contacts and address of record provided by International Access.

⁵ See generally *Amendment of Section 43.61 of the Commission's Rules*, CC Docket No. 91-22, Report and Order, 7 FCC Rcd 1379 (1992) (establishing the traffic and revenue reporting requirements that were in effect at the time of International Access's ISPC assignment).

⁶ In 2017, the Commission eliminated the requirement that U.S. providers of international telecommunications services file annual Traffic and Revenue Reports. See *Section 43.62 Reporting Requirements for U.S. Providers of International Services; 2016 Biennial Review of Telecommunications Regulations*, IB Docket Nos. 17-55, 16-131, Report and Order, 32 FCC Rcd 8115 (2017). Providers, including International Access, were required to file the final traffic and revenue data for calendar year 2015. A review of our records indicates that International Access submitted traffic and revenue data for 2004 but not for subsequent years. See Strategic Analysis and Negotiations Division, Multilateral Negotiations and Industry Analysis Branch, International Bureau, 2004 International Telecommunications Data (Filed as of October 31, 2005) at 2 (March 2006), <https://www.fcc.gov/document/2004-international-telecommunications-data-filed-october-31-2005>.

⁷ SPC-NEW-19991108-00105. The staff called the following telephone number: (805) 374-2460.

⁸ Email from Arthur Lechtman, Attorney-Advisor, Telecommunications and Analysis Division, International Bureau, to Bill Wade, International Access, Inc. (bill@access-intl.com) (Jan. 19, 2021, 8:48 EDT); Return read receipt from Bill Wade to Arthur Lechtman (January 19, 2021, 10:19 EDT); Email from Arthur Lechtman, Attorney-Advisor, Telecommunications and Analysis Division, International Bureau, to Bill Wade, International Access, Inc. (bill@access-intl.com) (Jan. 22, 2021, 14:02 EDT); Return read receipt from Bill Wade to Arthur Lechtman (January 22, 2021 14:02 EDT). These emails are reprinted in the Attachment below.

If you have any questions, please contact me at (202) 418-7370 or Francis.Gutierrez@fcc.gov or my colleague Arthur Lechtman at (202) 418-1465 or Arthur.Lechtman@fcc.gov.

Sincerely,

/Francis Gutierrez/

Francis Gutierrez
Deputy Chief, Telecommunications and Analysis
Division
International Bureau

Attachment

Email Exchange 1

From: Bill Wade <bill@access-intl.com>
Sent: Tuesday, January 19, 2021 10:19 AM
To: Arthur Lechtman <Arthur.Lechtman@fcc.gov>
Subject: Read: International Access, Inc. - international signaling point code

Your message

To: Bill Wade
Subject: International Access, Inc. - international signaling point code
Sent: Tuesday, January 19, 2021 5:48:15 AM (UTC-08:00) Pacific Time (US & Canada)

was read on Tuesday, January 19, 2021 7:19:16 AM (UTC-08:00) Pacific Time (US & Canada).

From: Arthur Lechtman <Arthur.Lechtman@fcc.gov>
Sent: Tuesday, January 19, 2021 8:48 AM
To: bill@access-intl.com
Cc: Francis Gutierrez <Francis.Gutierrez@fcc.gov>; Stacey Ashton <Stacey.Ashton@fcc.gov>
Subject: International Access, Inc. - international signaling point code

Hello Mr. Wade,

I am writing to inquire whether International Access, Inc. (d/b/a Access international) is still using the international signaling point code that it was assigned in 1999 (3-182-1 for use in LA, CA). Please let me know by email or call me at the number below if you have any questions. Thank you,

Artie Lechtman

Federal Communications Commission
International Bureau
202.418.1465

Email Exchange 2

From: Bill Wade <bill@access-intl.com>
Sent: Friday, January 22, 2021 2:02 PM
To: Arthur Lechtman <Arthur.Lechtman@fcc.gov>
Subject: Read: RE: International Access, Inc. - international signaling point code

Your message

To: Bill Wade
Subject: RE: International Access, Inc. - international signaling point code
Sent: Friday, January 22, 2021 11:01:47 AM (UTC-08:00) Pacific Time (US & Canada)

was read on Friday, January 22, 2021 11:02:29 AM (UTC-08:00) Pacific Time (US & Canada).

From: Arthur Lechtman <Arthur.Lechtman@fcc.gov>
Sent: Friday, January 22, 2021 2:02 PM
To: bill@access-intl.com
Cc: Francis Gutierrez <Francis.Gutierrez@fcc.gov>; Stacey Ashton <Stacey.Ashton@fcc.gov>
Subject: RE: International Access, Inc. - international signaling point code

Hello Mr. Wade-

Just writing again to be sure you saw my earlier email. Also, if International Access has a new address/phone number since 1999, please let us know that too. Thank you,

Artie Lechtman

Federal Communications Commission
International Bureau
202.418.1465

From: Arthur Lechtman <Arthur.Lechtman@fcc.gov>
Sent: Tuesday, January 19, 2021 8:48 AM
To: bill@access-intl.com
Cc: Francis Gutierrez <Francis.Gutierrez@fcc.gov>; Stacey Ashton <Stacey.Ashton@fcc.gov>
Subject: International Access, Inc. - international signaling point code

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Artie Lechtman

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